

DOLLY M. TROMPETER, ESQ.
CA Bar ID No. 235784
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 415-271-8604
Fax: 866-282-6709
dolly@dollydisabilitylaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Rosa Isela Rivera,

Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,

Defendant.

Case No. 1:23-cv-00900-BAM

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from September 13, 2023 to November 13, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of September 18, 2023 and September 25, 2023,
2 Counsel currently has 11 merit briefs, and several letter briefs and reply briefs.
3 This matter has recently been reassigned and Plaintiff's Counsel requires
4 additional time to brief the issues thoroughly for the Court's consideration.
5 Defendant does not oppose the requested extension. Counsel apologizes to the
6 Defendant and Court for any inconvenience this may cause.

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8 Respectfully submitted,

9 Dated: September 5, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

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11 By: /s/ Dolly M. Trompeter
12 DOLLY M. TROMPETER
13 Attorneys for Plaintiff
14

15 Dated: September 5, 2023 PHILLIP A. TALBERT
16 United States Attorney
17 PETER K. THOMPSON
18 Acting Regional Chief Counsel, Region IX
19 Social Security Administration

20
21 By: */s/ Justin Lane Martin
22 Justin Lane Martin
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on September 5, 2023)
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ORDER

Pursuant to stipulation, and cause appearing, Plaintiff's request for an extension of time to November 13, 2023, to file her Motion for Summary Judgment is GRANTED. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: September 6, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE